

1 question I asked you about these licenses. Was it your  
2 understanding --

3 A That they had a license.

4 Q -- from this deposition that your wife and  
5 daughters had had licenses?

6 A Yes, sir.

7 Q Okay. And at the time you read the Net Wave  
8 petition for the very first time it was your understanding  
9 also, was it not, that Norma, Jennifer and Melissa had had a  
10 license from the FCC?

11 A Yes, sir.

12 Q Okay.

13 A That was my understanding.

14 Q Have you seen a copy of those licenses anywhere in  
15 this litigation, those early licenses?

16 A No, sir. No. Are you -- you've got me confused  
17 about an application or a license. Is there a difference?

18 Q Well, what is it in your mind?

19 A I don't know. I mean, you showed me one thing  
20 earlier that said radio license at the top, and then we've  
21 seen applications.

22 Q With all due respect, I don't think I showed you  
23 anything.

24 A Well, I mean, the litigation showed me.

25 Q Okay. My question is to your state of mind, sir.

1 A All right, sir.

2 Q You understood at one time, deposition time and  
3 then back at the time of the Net Wave petition, that they  
4 had a license issued in their name?

5 A Yes, sir, I understood that.

6 Q Okay. And in fact you know for a fact that Norma  
7 had prior FCC licenses before these 1996 issues, correct?

8 A I saw during the -- what you presented to her  
9 during the deposition, applications. I don't know if those  
10 are license or applications.

11 Q You do not understand that Norma had licenses  
12 issued in her name --

13 A I understood she did.

14 Q -- prior to 1996?

15 A Yes, sir. I understood she did.

16 Q Okay.

17 A I haven't seen the license if that's what you are  
18 asking.

19 Q No, sir. I have never asked you in this  
20 examination so far whether you have seen a license.

21 A Okay.

22 Q So if you will please listen to my question, we  
23 can get through this thing a little sooner.

24 You understood as you sit here today that Norma  
25 had previous FCC licenses before the 1996 application that

1 this lawsuit is about?

2 A Yes, sir.

3 Q And you understand that Norma had more than one  
4 FCC license back then; is that right?

5 A Yes, sir.

6 Q How many did she have?

7 A I don't know. I think at least two that she  
8 signed.

9 Q Okay.

10 A And others that she didn't sign.

11 Q How many licenses did Jennifer have before this  
12 1996 matter?

13 A She only signed one application. I don't know how  
14 many licenses you can generate from that application.

15 Q Do you know for a fact, sir, that there never was  
16 a license issued in Jennifer's name?

17 A No, sir, I do not know that.

18 Q Have you inquired of anyone to find out whether  
19 there was actually a license issued in her name?

20 A No, sir. It was of no interest to me back then.

21 Q Have you seen in this litigation, sir, anything  
22 that purports to be an application signed by Jennifer back  
23 then before the 1996 issues?

24 A No, sir.

25 Q My questions now pertain to Melissa.

1 A Okay.

2 Q Have you seen any application that purports to be  
3 an application by Melissa for an FCC license back before  
4 these 1996 matters?

5 A No, sir.

6 Q Have you see anything that purports to be a  
7 license to Melissa prior to these 1996 matters?

8 A No, sir.

9 Q Have you asked why you haven't seen any of that  
10 stuff?

11 A Ask who?

12 Q Anybody. Your counsel?

13 A No, sir.

14 Q FCC counsel?

15 A No, sir. We understood that if a license was  
16 granted, it was immediately transferred to Ronald. That's  
17 what we thought in those prior years, and that's what we  
18 still felt.

19 Q And have you verified that with anybody, your  
20 counsel or FCC counsel in this litigation?

21 A No, sir. I -- no, sir.

22 Q Now, let me refer you back to your -- well, let me  
23 refer you to the Net Wave petition.

24 A What exhibit number?

25 MR. ROMNEY: I'm not going to be asking him any

1 questions out of the deposition at any time.

2 JUDGE STEINBERG: No, he's -- you referred to the  
3 Net Wave petition, and the witness asked what number it is,  
4 Exhibit No. 1.

5 MR. ROMNEY: My comment was to Mr. Mr. McVeigh.

6 JUDGE STEINBERG: Oh.

7 MR. ROMNEY: I'm not going to be asking questions  
8 about the deposition at this point.

9 JUDGE STEINBERG: Oh, okay. I missed something in  
10 there.

11 MR. ROMNEY: Thank you.

12 JUDGE STEINBERG: So if you --

13 MR. ROMNEY: Exhibit No. 1.

14 JUDGE STEINBERG: Yes.

15 THE WITNESS: One?

16 MR. ROMNEY: Yes, sir.

17 (Pause.)

18 BY MR. ROMNEY:

19 Q Where were you when you got a copy of Exhibit No.  
20 1, sir?

21 A I got it from my mailbox in my office at my office  
22 address, 18601 LBJ Freeway in Mesquite, Texas.

23 Q And that is indeed the address that's listed for  
24 you on the back of page -- excuse me -- on page 65 of that  
25 petition?

1 A Hang on just a second.

2 Q Excuse me. Sixty-six.

3 (Witness reviews document.)

4 THE WITNESS: Yes, sir, that's the correct  
5 address.

6 BY MR. ROMNEY:

7 Q Did you wife receive a copy of this?

8 A Yes, sir.

9 Q Where did she receive it?

10 A I recall she received it at home.

11 Q I'll refer you to page 65 of the Exhibit No. 1.  
12 You see Norma Sumpter's name listed there?

13 A Yes, sir, I do.

14 Q Now, your home address is not 4008 Harbinger, is  
15 it?

16 A It's not.

17 Q Did Melissa receive a copy of this?

18 A Yes, sir.

19 Q Do you know where she received it?

20 A At home.

21 Q And was she home at the time?

22 A November. No, sir, she was close to graduation  
23 from college.

24 Q Where was she, do you recall, at this time, that  
25 she received these petition?

1           A     She would have been at school. I don't know. She  
2 was home or at school. She was either at home or at school.

3           Q     Where is Mary Hardin Baylor?

4           A     In Belton, down below Temple, down below Waco.

5           Q     How long does it take you to get down to Mary  
6 Hardin from your house?

7           A     Two hours; hour and a half, two hours.

8           Q     Page 66 of Exhibit No. 1, do you see the address  
9 for Jennifer Hill?

10          A     Yes, sir.

11          Q     Did you understand that Jennifer Hill received a  
12 copy of this petition as well?

13          A     I know she did.

14          Q     Do you have any knowledge, sir, where she received  
15 it?

16          A     I would assume in her apartment. That's where it  
17 was mailed or that's what that says. I'm sure it was at her  
18 apartment.

19          Q     Did she tell you that?

20          A     Yes, sir.

21          Q     Okay. The day you received this document, did you  
22 open the envelope that it came in, this Exhibit No. 1?

23          A     Yes, sir.

24          Q     Was anybody else present when you opened it?

25          A     I don't believe so.

1 Q Was your wife in the office with you?

2 A She was in the office because I told her, "What is  
3 this," you know.

4 Q Was she watching you open the envelope?

5 A I don't recall.

6 Q What did you understand when you read that  
7 document for the first time?

8 A What did I understand? Very little except I was  
9 shocked.

10 Q And what went through your mind?

11 A What is this? What is -- first, what kind of  
12 document is this? Where did it come from? How did my name  
13 get it on it? I've never signed anything. I've never  
14 signed any kind of application or anything. How did my name  
15 get on it?

16 Here is the words I used with Ronald when I called  
17 him.

18 Q Okay.

19 A I'm in this Ronald. Where did my name come from?"  
20 Plus my wife and children's names are in there. I  
21 didn't understand they had a license.

22 Q Did you talk to your wife before you called  
23 Ronald?

24 A I don't remember.

25 Q Well, sir, is this a document that since it had



1     their names on it, is this a document that you would have  
2     talked to your wife about since she is there in the office  
3     with you?

4             A     I'm sure I talked to her about it.

5             Q     What did you say to her?

6             A     What is this? I don't know what -- we've got  
7     something in the mail here. Someway it's about -- something  
8     about radio license, and it's got my name, it's your name,  
9     it's got Melissa's, it's got Jennifer's." Those are the  
10    things I'm sure I talked to her about.

11                We tried to read it, tried to understand it. We  
12    didn't understand it.

13            Q     What did she say, your wife?

14            A     She's as puzzled as I am.

15            Q     Did you ask her if she had a radio license?

16            A     I asked her, now, you had a radio license in the  
17    past but they would have been transferred out of your name.  
18    She said, "That's right." That's all she knew.

19            Q     Did you ever ask her if she had a radio license  
20    for the 1996 time frame?

21            A     Sure, she didn't --

22            Q     What did she say?

23            A     She said no.

24                Are you saying that she filed an application in  
25    '96 for a radio license? Is that your question.

1 Q That's not my question to you, sir.

2 A Okay, what is it?

3 Q Well, I asked it to you and you answered.

4 JUDGE STEINBERG: Well, were you confused by the  
5 question?

6 THE WITNESS: Yes, I was.

7 JUDGE STEINBERG: Okay, why don't you re-ask it,  
8 please?

9 BY MR. ROMNEY:

10 Q Did you ask her that day that you opened Exhibit  
11 No. 1, did you ask her whether or not she had a radio  
12 license from the 1996 time frame?

13 A Well, with all due respect, I really didn't have  
14 to ask her because her name was listed on the front along  
15 with mine, and Melissa's and Jennifer's. I knew she had a  
16 license from reading the front of that application -- I mean  
17 that petition.

18 Q Did you ask her that day that you opened Exhibit  
19 No. 1 whether or not she had signed an application for a  
20 license?

21 A Yes, I did.

22 Q And what did she say?

23 A No.

24 Q Did you ask her whether or not she had signed a  
25 license for you?

1 A Yes.

2 Q What did she say?

3 A No.

4 Q Did you ask her whether or not she had signed a  
5 license for Melissa?

6 A Yes.

7 Q And what did she say?

8 A No.

9 Q Did you ask her if she signed a license for  
10 Jennifer?

11 A Yes.

12 Q And what did she say?

13 A No.

14 Q And you had all those conversations with your wife  
15 that day, the day you saw Exhibit No. 1?

16 A In that time frame, yes, sir, I did.

17 Q Why would you ask your wife those kinds of  
18 questions, whether she had signed licenses for somebody  
19 else?

20 A I didn't know what this was. I didn't understand  
21 it.

22 Q Well, did you suspect that she might have signed  
23 something for you?

24 A Absolutely not.

25 Q Well, then why would you even think to ask her?

1           A     Ask her what -- what did we know about this, if  
2 she's got any knowledge about any of this stuff.

3           Q     Did you ask her if she had any knowledge or did  
4 you ask her specifically, sir, whether or not she had signed  
5 a license on your behalf?

6           A     I don't believe I asked her, on second thought,  
7 that I -- I don't believe I asked her that she signed, if  
8 she signed anything. I knew she didn't sign it. I asked  
9 her if she had knowledge of it.

10          Q     And that's the only thing you asked her then, do  
11 you have knowledge of this license?

12          A     What do you know about this? Do you know anything  
13 about this?

14          Q     And she said no.

15          A     She said no.

16          Q     She knows nothing?

17          A     She knows nothing.

18          Q     Okay. So then you did not ever specifically ask  
19 her from that day that you opened Exhibit No. 1 up until the  
20 time you're sitting right here on the stand today, sir,  
21 whether or not she signed your name to an application for a  
22 radio license?

23          A     Yes, sir. We have talked about that at length and  
24 she has not signed my name, Melissa's or Jennifer's to  
25 anything -- to those radio license.

1 Q Tell the Court exactly when you discussed that  
2 with your wife.

3 A It's been an ongoing discussion ever since this  
4 started about this situation. I couldn't tell you the exact  
5 date and the time.

6 Q And are you telling the Court that you asked her  
7 specifically as I have stated it, "Norma, did you sign my  
8 name to a radio license application?"

9 A Yes, sir, I did.

10 Q And she told you no?

11 A Right.

12 Q Did you ask if she signed Jennifer's name to an  
13 application?

14 A Yes, sir.

15 Q Did you ask her if she signed Melissa's name to an  
16 application?

17 A Yes, sir.

18 Q And her answers for those two were?

19 A No.

20 Q Did you ask her if she signed her name to a radio  
21 license application in 1996?

22 A Yes, sir.

23 Q And what did she say?

24 A No.

25 Q And when did you first ask her that question?

1           A     I think the day we got this. I said, "Have you  
2 signed something? Have you done something here to cause  
3 this?"

4           Q     You picked up the phone and you called Ron and you  
5 asked him what, after you opened Exhibit 1?

6           A     I didn't ask him much of anything. I just begin  
7 to tell him about this thing I had received in the mail, and  
8 I did ask him what is this, what is this? I'm in this. My  
9 name's on it. My wife and children's names on it. I have  
10 not signed an application. I have not signed anything. How  
11 did my name get on it? That's what our conversation went on  
12 like.

13          Q     And he told you at that time that you had signed  
14 an application, right?

15          A     No, he did not. He told me he was going to and  
16 look at it, and he did.

17          Q     Okay. And he came to your office to look at it?

18          A     Right.

19          Q     Do you know if he had seen a copy of this --

20          A     He said he had not.

21          Q     Excuse me, please.

22          A     I'm sorry.

23          Q     Do you know if he had seen a copy of this, Exhibit  
24 No. 1, by the time he came to your office to discuss it with  
25 you?

1 A He had not.

2 Q And how do you know that?

3 A Because he said he had not.

4 Q What did he tell you after he read the Net Wave  
5 petition, Exhibit No. 1?

6 A Don't worry about it. It's a competitor trying to  
7 cause problems and cause trouble. Don't worry about it.  
8 I'll take care of it.

9 Q Did you believe him that he would take care of it?

10 A I hoped he would.

11 Q What is the very next document that you saw that  
12 has anything to do with this litigation?

13 A The next document that I saw?

14 Q Yes, sir.

15 A Document.

16 Q After the Net Wave petition. You opened that  
17 document on the day, and what's the very next piece of paper  
18 you saw that has anything to do with this issue?

19 JUDGE STEINBERG: Clarification. Document from  
20 somebody from --

21 MR. ROMNEY: Any document, sir.

22 JUDGE STEINBERG: Okay.

23 MR. ROMNEY: Any document, Your Honor.

24 THE WITNESS: The next document --

25 MR. MCVEIGH: Including ones he generated himself?

1 MR. ROMNEY: Absolutely. I would really like to  
2 know that.

3 THE WITNESS: Oh, a document I generated myself?

4 MR. ROMNEY: Any document. Yes.

5 THE WITNESS: I wrote him a letter that you have.  
6 It's some exhibit number. I think it's dated the 27th of  
7 November. I don't know the exhibit number. I think that's  
8 the date. That probably is the next document.

9 MR. ROMNEY: Excuse me, Your Honor, while I find  
10 the document.

11 (Pause.)

12 BY MR. ROMNEY:

13 Q Mr. Sumpter, would you put before you please  
14 Exhibit No. 39?

15 A Yes, sir.

16 Q Is that the very next document that you recall  
17 seeing that has any connection to this particular matter of  
18 the radio licenses in 1996?

19 A The only other document that came along close to  
20 the same time was the Form 800A, is that what it's called,  
21 800A. I'm not sure which came earlier, but I did write this  
22 letter soon after we received the Net Wave petition.

23 Q I'll refer you to Exhibit No. 38.

24 A Thirty-eight. That's the 800, right?

25 Q Right. And that came to you?



1           A     I don't know if it came to me or Ronald brought  
2     it. I'm not sure.

3           Q     Well, it's addressed to you, is it not?

4           A     It is.

5           Q     Does Ronald have access to your mailbox?

6           A     No, sir.

7           Q     That handwriting on Exhibit No. 38 --

8           A     Yes.

9           Q     -- whose is it?

10          A     It's mine, as I explained in my letter of December  
11     the 20th.

12          Q     You filled this document out?

13          A     I did.

14          Q     Did you receive the 800A, Exhibit No. 38, before  
15     you wrote Exhibit No. 39 on November 29, 1997?

16          A     I don't know, but I don't think that I filled it  
17     out. What I think happened is that all mail that came to  
18     the office that had to with FCC was forwarded to Ronald.  
19     And I think the 800 was forwarded to him, and that he  
20     brought it back for us to fill it out.

21          Q     Well, sir, was that the procedure at your  
22     office --

23          A     Yes, it was.

24          Q     -- from the time you had Norma's early licenses?

25          A     Yes, sir.

1 Q Anything that came with FCC was sent to Ronald?

2 A Yes, sir.

3 Q And is it your testimony that it was sent to  
4 Ronald without ever even being opened?

5 A Yes, sir.

6 Q So to your knowledge, a license could have come to  
7 your office and had been sent by your wife to Ron without it  
8 being opened?

9 A Could have.

10 Q And yellow cards or green cards could have been  
11 sent to Ronald office by your wife without you ever knowing  
12 about it?

13 A Could have.

14 Q So you can't deny that those materials from the  
15 FCC or from PCIA never came to your office; it's just that  
16 you don't have knowledge that they did?

17 A I'll say this. The first time I ever had an  
18 inkling that I had a radio license was when I opened that  
19 petition to show cause. That's the first time I had a hint  
20 of anything that I own -- that I had a radio license.  
21 That's the first time.

22 MR. ROMNEY: Move to strike, Your Honor;  
23 nonresponsive.

24 JUDGE STEINBERG: Granted.

25 BY MR. ROMNEY:

1 Q Mr. Sumpter, my question is: You cannot deny that  
2 mailings from the FCC could have come to your office, can  
3 you?

4 A They did come to my office.

5 Q You cannot deny that mailings from the FCC prior  
6 to the Net Wave petition came to your office, can you?

7 A No, sir.

8 Q Ronald told you the day that he was at your office  
9 to look at the New Wave petition that he would handle it; is  
10 that right?

11 A Yes, sir.

12 Q Did he tell you how he was going to handle it?

13 A No, sir.

14 Q Did you ever have a discussion with Ronald about  
15 his attorneys handling it?

16 A He just said he was going to handle it.

17 Q Well, you got the copy of an opposition, did you  
18 not?

19 A Yes, sir.

20 Q I would ask you to turn to Exhibit 37. Do you see  
21 that, sir?

22 A Yes, sir.

23 Q That's a declaration that you prepared; is that  
24 correct?

25 A Yes, sir.

1 Q Did you attorney assist you in preparing that?

2 A Yes, sir.

3 Q Would you please point to the Court anywhere in  
4 the declaration where it says that you were visiting your  
5 sick aunt in Junction, Texas on or about June 22, 1996?

6 A It's not in there.

7 Q Don't you think that's an important point that the  
8 FCC might want to know?

9 MR. MCVEIGH: Objection; asking the witness to  
10 speculate.

11 JUDGE STEINBERG: I think that's within the realm  
12 of cross-examination. I'll overrule it.

13 THE WITNESS: Repeat it, please, sir.

14 BY MR. ROMNEY:

15 Q Don't you think that's an important point that the  
16 FCC might want to know, that you were not in town in  
17 Mesquite, Texas on June 22, 1996?

18 A At that point June 22nd didn't mean a thing to me.  
19 I hadn't seen the license, I hadn't seen the application,  
20 and I didn't know that Ronald was going to say there was a  
21 signing party at his house on June the 22nd.

22 Q Well, didn't --

23 A I didn't know that when I wrote this declaration.

24 Q When did you write this declaration, sir?

25 A Some time in '99.

1 Q April 9, 1999?

2 A It should be dated on the back.

3 Q Page 8?

4 A April 9, '99.

5 Q Is that the day you signed it?

6 A Yes, sir.

7 Q Did you cause your attorney to file any subsequent  
8 declaration with the FCC to explain that you were not in  
9 Mesquite, Texas on June 22, 1996?

10 A Not until today.

11 JUDGE STEINBERG: I just wanted to point out that  
12 there is an attorney/client privilege, and there had not  
13 been any objections raised by Mr. McVeigh or anybody else  
14 about attorney/client privilege. But if Mr. Romney would  
15 phrase his questions without reference to Mr. Sumpter's  
16 attorney and just leave it at what was done rather than done  
17 on advice of counsel, because I don't want this to be  
18 construed as any kind of waiver because I don't think that's  
19 the intent of the witness, I mean --

20 MR. ROMNEY: And that's not the intent of my  
21 questions.

22 JUDGE STEINBERG: I didn't think it was but I just  
23 wanted --

24 MR. ROMNEY: Appreciate that.

25 JUDGE STEINBERG: -- wanted to point it out.

1 BY MR. ROMNEY:

2 Q Mr. Sumpter, you may assume that any question I  
3 ask you that I am not asking you for any discussions that  
4 you had with your attorney.

5 A All right. I understand that.

6 Q I would ask you to turn to page 14 of Exhibit No.  
7 37.

8 A Okay.

9 Q This is a fax cover sheet from Mr. Brasher's  
10 attorney; is that right?

11 A It was faxed to me by Mr. Brasher.

12 Q And you discussed this document with Mr. Brasher,  
13 right?

14 A No, sir, I didn't discuss it with him.

15 Q No discussion at all?

16 A I don't remember that I did.

17 Q It just came out of the blue to your fax machine?

18 A Yes, sir.

19 Now, let me back up here.

20 JUDGE STEINBERG: Wait a minute. There is no --

21 THE WITNESS: No backing up?

22 BY MR. ROMNEY:

23 Q Yes, yes, please explain yourself.

24 A Okay. We were talking about this on an ongoing  
25 basis, and he told me that he -- his attorneys was working

1 on it, and then he faxed it to me. That's the way I  
2 remember it.

3 Q So before you got this on your fax machine, you  
4 had had some sort of discussion with Mr. Brasher to the  
5 effect that his attorneys were working on some sort of a  
6 response to the Net Wave petition, right?

7 A His comment to me, sir, was that his attorneys  
8 would take care of it.

9 Q And right after he said his attorney are going to  
10 take care of it, within days or weeks you get a copy of a  
11 memo from his attorney to him with a draft of an opposition,  
12 right?

13 A Yes, sir.

14 Q And you read through that opposition line by line,  
15 didn't you?

16 A No, sir.

17 Q You read it?

18 A I read it, but not line by line. I didn't study  
19 it.

20 Q Did you not understand what you were reading?

21 A No, sir.

22 Q Why did you not ask anybody any questions?

23 A Because Ronald said, "Don't worry about it. I'll  
24 take care of it."

25 Q And when he says, "I'm going to take care of it,"

1 he sends you a how many page document?

2 MR. MCVEIGH: Objection. I don't think that's a  
3 question.

4 MR. ROMNEY: I'm not done with my question.

5 MR. MCVEIGH: Oh, I'm sorry.

6 MR. ROMNEY: Excuse me. I apologize for not being  
7 fast enough.

8 BY MR. ROMNEY:

9 Q He sends you a six-page document after he told his  
10 attorneys are going to take care of it, and you don't read  
11 it?

12 A I said I read it. I didn't study it.

13 Q And if you don't understand it, you didn't ask any  
14 questions about it?

15 A No, sir.

16 Q You read it and you understood that this was an  
17 opposition by, among other people, Jim Sumpter?

18 A I knew that anything I said to Ronald wouldn't  
19 change the picture or change what was being submitted.

20 Q That's not my question, sir, respectfully. I'm  
21 sorry. I don't mean to be rude.

22 A Okay.

23 Q You understood when you read it that this was an  
24 opposition by, among other people, Jim Sumpter, correct?

25 A I didn't know what an opposition was, counselor.



1 Q Have you ever done any tax work before the IRS?

2 A No, sir.

3 Q Never done any kind of representation of a client  
4 before the IRS?

5 A Through appeals process.

6 Q Okay. What does opposition mean to you, the word?

7 A It means someone opposes you.

8 Q And you had already seen a document that had a  
9 heading like this, that was the Net Wave petition, right?

10 A Right.

11 Q I mean, looking at page No. 15 of Exhibit No. 37,  
12 that heading there wasn't entirely foreign to you, was it?

13 A It looked like the Net Wave.

14 Q And opposition, did you have any understanding  
15 that Net Wave would be filing an opposition against their  
16 own pleading?

17 A No.

18 Q Well, then, you understood just from common sense,  
19 sir, and the fact that you are a trained certified public  
20 accountant, you understood that this opposition was probably  
21 somebody writing something to the FCC against the Net Wave  
22 petition?

23 THE WITNESS: Objection; not a question.

24 JUDGE STEINBERG: Yes, it sure was.

25 MR. ROMNEY: Absolutely.

1 MR. MCVEIGH: I thought it was a statement.

2 JUDGE STEINBERG: No, it was a question.

3 THE WITNESS: Sir, I don't know what I understood  
4 this was except that Ronald simply said, "I'm going to take  
5 care of this," and this is what he produced, or his  
6 attorneys produced. That's all I know.

7 BY MR. ROMNEY:

8 Q And you understood they were taking care of it on  
9 your behalf, right?

10 A Not really, but I knew that there was nothing I  
11 could do to change it.

12 Q You knew by reading this document that somebody  
13 was getting ready to file something that said an opposition  
14 with the FCC and it included you, right?

15 A I didn't understand. I did not understand that it  
16 included me. It was not my words. It was not my decision  
17 to file it. I did not understand. I mean, this heading was  
18 on the Net Wave petition. I thought it had to be on this  
19 one too.

20 JUDGE STEINBERG: Let me ask you a question. You  
21 testified a couple of times that Ron Brasher said with  
22 respect to the Net Wave petition, "Don't worry about it.  
23 We'll take care of it."

24 THE WITNESS: Yes, sir.

25 JUDGE STEINBERG: And did you understand when you